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October 1, 14

Honorable Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007
Fax: 212-805-7942

RE: United States v. Daniel Barrera Barrera, *et als.*
Criminal Docket No. 07 CR 862 (AKH)

Dear Judge Hellerstein:

The above referenced matter is scheduled for a status conference on Friday, October 5th, 2014 at 10:30 A.M. The parties are jointly requesting that this matter be reset in order to allow the parties to continue their plea negotiations in this cause. Substantive progress is being made towards an amicable resolution that includes addressing the pending indictments in other districts. Specifically, an agreement has been reached such that the case currently pending in the Eastern District of New York will be transferred to this district. The parties are now in the process of effectuating such a transfer to this district so that the cases can be consolidated before this Honorable Court. Undersigned counsel has conferred with Assistant United States Attorney, Benjamin Naftalis, Esq. who joins in the request herein.

Accordingly, the parties jointly request that the Court adjourn the status conference. The parties respectfully request that the Court exclude the time from October 5th, 2014 through the new date as scheduled by the Court. The parties submit that such an exclusion would serve the ends of justice in this matter and outweighs the best interest of the public and the defendant in a speedy trial pursuant to Title 18, United States Code, Section 3161(h)(7)(A), because it will allow the parties to continue their negotiations. The Government joins in this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "R. O.", is located at the bottom left of the page. The signature is stylized and fluid.

Ruben Oliva, Esq.

cc: Jenna Dabbs, AUSA
Benjamin Naftalis, AUSA